

NO.: FBT-CV-15-6048078-S : SUPERIOR COURT
JONATHAN SHAPIRO : J. D. OF FAIRFIELD
VS. : AT BRIDGEPORT
DELBOUNO, FRANK, ET AL : MARCH 25, 2015

**DEFENDANTS' RESPONSE TO PLAINTIFF'S REQUEST FOR ADMISSION OF
FACTS**

Pursuant to Practice Book Section 13-22, the plaintiff, Jonathan Shapiro, requests that the defendants, Frank Delbouno, Jr., and City of Bridgeport, admit within thirty (30) days after the filing of this request, that the following facts are true for the purpose of this action only:

1. The Investigative Office intended to check the "OTHER"- The claimant failed to yield to an emergency vehicle" box on the Claim Number- 9577 (Jonathan Shapiro) denial letter from the City of Bridgeport, Office of the City Attorney, dated May 7, 2013 (copy attached), but- in error- failed to do so.

ANSWER: ADMIT

2. On Friday, February 15, 2013, at approximately 1:30 p.m., the defendant

Frank Delbouno, Jr., was driving a Bridgeport police cruiser and acting as an employee of the City of Bridgeport, as the agent servant and employee of the City of Bridgeport, within the scope of said agency.

ANSWER: ADMIT

3. On Friday, February 15, 2013, at approximately 1:30 p.m. and/or immediately prior to the collision that is the subject of the above-entitled action, the defendant, Frank Delbouno, Jr. was operating the police cruiser without a siren.

ANSWER: ADMIT

4. On Friday, February 15, 2013, at approximately 1:30 p.m. and/or immediately prior to the collision that is the subject of the above-entitled action, the defendant Frank Delbouno, Jr. was operating the police cruiser without warning lights.

ANSWER: DENY

5. On Friday, February 15, 2013, at approximately 1:30 p.m., the defendant Frank Delbouno, Jr. was on duty for the City of Bridgeport Police Department.

ANSWER: ADMIT

6. On Friday, February 15, 2013, at approximately 1:30 p.m., the defendant Frank Delbouno, Jr. operated the police cruiser through a red traffic signal at the intersection of Myrtle Avenue and Prospect Street.

ANSWER: DENY

7. On Friday, February 15, 2013, at approximately 1:30 p.m., the defendant Frank Delbouno, Jr. operated the police cruiser without a siren through a red traffic signal at the intersection of Myrtle Avenue and Prospect Street.

ANSWER: DENY

8. On Friday, February 15, 2013, at approximately 1:30 p.m., the defendant Frank Delbouno, Jr. operated the police cruiser without warning lights through a red traffic signal at the intersection of Myrtle Avenue and Prospect Street.

ANSWER: DENY

9. On Friday, February 15, 2013, at approximately 1:30 p.m., Jonathan Shapiro operated this motor vehicle through a green traffic signal at the intersection of Myrtle Avenue and Prospect Street immediately prior to the collision that is the subject of this lawsuit.

ANSWER: DENY

10. On Friday, February 15, 2013, immediately prior to the collision that is the subject of the above-entitled action, the defendant Frank Delbouno, Jr. was operating the police cruiser at a higher speed than the governing limit.

ANSWER: DENY

11. On Friday, February 15, 2013, Jonathan Shapiro operated his motor vehicle at a reasonable speed immediately prior to the collision that is the subject of this lawsuit.

ANSWER: We are unable to admit or deny this allegation.

CERTIFICATION

This is to certify that a copy of the foregoing has been mailed, this 25th day of March, 2015 to:

Kevin C. Shea, Esq.
Clendenen & Shea, LLC
400 Orange Street
New Haven, CT 06511

_____/s/_____
Russell D. Liskov